

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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PAUL D. CEGLIA,

Plaintiff,

v.

MARK ELLIOT ZUCKERBERG and
FACEBOOK, INC.,

Defendants.
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**NOTICE OF MOTION FOR
EXPEDITED DISCOVERY**

Civil Action No. 1:10-cv-00569-
RJA

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the annexed Declarations of Mark Elliot Zuckerberg, Professor Frank J. Romano, Gus R. Lesnevich, Professor Gerald R. McMenamin, Bryan J. Rose, Michael F. McGowan, Don Henne, and Dr. Albert Lyter III, and accompanying exhibits, the undersigned will move this Court, at a date and time to be set by the Court, for expedited discovery under Federal Rule of Civil Procedure 26(d)(1), and an order:

(1) Compelling immediate production of the original signed version of the purported contract attached to the Amended Complaint, the native electronic version of that document, and all copies of the purported contract in electronic or hard-copy form;

(2) Compelling immediate production of the purported emails described in the Amended Complaint in their original, native electronic form, as well as all copies of the purported emails in electronic or hard-copy form;

(3) Immediately seizing, and permitting Defendants to inspect and image, all computers and electronic media in Plaintiff's possession, custody, or control; and

(4) Staying all other discovery until this initial phase of discovery is complete.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule of Procedure 7 of this Court, Defendants request oral argument and state their intention to file and serve reply papers.

Dated: New York, New York
June 2, 2011

Respectfully submitted,

/s/ Orin Snyder

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